

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

EMERGENCY PLANNING
MANAGEMENT INC.,

Plaintiff,

v.

THE UNITED STATES DEPARTMENT
OF EDUCATION,

Defendant.

Case No. 19-1024 C

Judge _____

APPLICATION FOR TEMPORARY RESTRAINING ORDER

Plaintiff, Emergency Planning Management Inc. (“EPM”), in support of its Application for Temporary Restraining Order (“Application”), states as follows:

In the instant case, EPM brings this pre-award protest challenging the Defendant U.S. Department of Education’s (“ED”) Solicitation No. 91003119R0008 (the “Solicitation”) issued under the Next General Processing and Servicing Environment for the procurement of student loan servicing and private debt collection services. The due date for proposals in response to the Solicitation is July 31, 2019. EPM hereby respectfully moves this Court for a temporary restraining order enjoining ED from awarding any contract under the Solicitation.

The grounds for this Application are set forth more fully in the accompanying Memorandum of Points and Authorities, filed concurrently herewith, together with the Complaint initiating this action.

Copies of the foregoing Application for Temporary Restraining Order have been provided, via the Case Management/Electronic Case Files (CM/ECF) system, to the ED and the U.S. Department of Justice as set forth on the accompanying Certificate of Service.

Respectfully submitted,

MATROSS EDWARDS, LLC

Dated: July 16, 2019

/s/ Joshua B. Duvall

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